

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LAYDON, on behalf of himself and all others similarly  
situated,

Plaintiff,

- against -

THE BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE  
SUMITOMO TRUST AND BANKING CO., LTD., THE  
NORINCHUKIN BANK, MITSUBISHI UFJ TRUST AND  
BANKING CORPORATION, SUMITOMO MITSUI BANKING  
CORPORATION, J.P. MORGAN CHASE & CO., J.P. MORGAN  
CHASE BANK, NATIONAL ASSOCIATION, J.P. MORGAN  
SECURITIES PLC, MIZUHO CORPORATE BANK, LTD.,  
DEUTSCHE BANK AG, THE SHOKO CHUKIN BANK, LTD.,  
SHINKIN CENTRAL BANK, UBS AG, UBS SECURITIES JAPAN  
CO. LTD., THE BANK OF YOKOHAMA, LTD., SOCIÉTÉ  
GÉNÉRALE SA, THE ROYAL BANK OF SCOTLAND GROUP  
PLC, THE ROYAL BANK OF SCOTLAND PLC, RBS SECURITIES  
JAPAN LIMITED, BARCLAYS BANK PLC, CITIBANK, NA,  
CITIGROUP, INC., CITIBANK, JAPAN LTD., CITIGROUP  
GLOBAL MARKETS JAPAN, INC., COÖPERATIEVE  
CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., HSBC  
HOLDINGS PLC, HSBC BANK PLC, LLOYDS BANKING  
GROUP PLC, ICAP EUROPE LIMITED, R.P. MARTIN  
HOLDINGS LIMITED, MARTIN BROKERS (UK) LTD.,  
TULLETT PREBON PLC, AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 12-cv-3419  
(GBD) (HBP)

**PLAINTIFF'S NOTICE OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT WITH THE BANK  
OF YOKOHAMA, LTD., SHINKIN CENTRAL BANK, THE SHOKO CHUKIN BANK,  
LTD., SUMITOMO MITSUI TRUST BANK, LTD., AND RESONA BANK, LTD.**

**PLEASE TAKE NOTICE** that, upon the accompanying memorandum of law, the Declaration of Vincent Briganti dated September 6, 2019, and the exhibits attached thereto including the Settlement Agreement, and the record herein, Plaintiff Jeffrey Laydon, by and through his undersigned counsel, will respectfully move this Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on Wednesday, September 11, 2019 at 10:00 a.m., for an order granting Plaintiff's motion for preliminary approval of the settlement with Defendants The Bank of Yokohama, Ltd., Shinkin Central Bank, The Shoko Chukin Bank, Ltd., Sumitomo Mitsui Trust Bank, Ltd.,<sup>1</sup> and Resona Bank, Ltd, and the other relief set forth in the proposed order filed herewith.

Dated: September 6, 2019  
White Plains, New York

**LOWEY DANNENBERG, P.C.**

By: /s/ Vincent Briganti

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<sup>1</sup> Sumitomo Mitsui Trust Bank, Limited was formerly known, and was sued as The Sumitomo Trust and Banking Co., Ltd. ("STB"). The Chuo Mitsui Trust and Banking Company, Limited, which was also sued in the *Laydon* action, merged into STB prior to the action to form Sumitomo Mitsui Trust Bank, Limited.

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